



The Coalition of  
Airline Pilots Associations

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April 8, 2003

Docket Management System  
U.S. Department of Transportation  
Room Plaza 401  
400 Seventh Street SW  
Washington D.C. 20590-0001

RE: Docket No.FAA-2002-12261 - 84

To Whom It May Concern:

The Coalition of Airline Pilots Associations (CAPA) would like to thank the Department of Transportation (DOT) for giving us the opportunity to present comments for such an important issue the Reduced Vertical Separation Minimums (RVSM).

CAPA is a nonprofit trade organization that represents over 21,000 pilots. CAPA's five members are unions groups composed of passenger and cargo airlines: American Airlines, Southwest, Air Tran, UPS and Airborne Express.

**Support of Implementation of SNPRM**

As stated on the Supplemental Notice of Proposed Rule Making (SNPRM), the economical aspect to the airlines, the flexibility in which controllers will be able to handle traffic and the increased safety factor, as result of dual altimeters and stringent autopilot performance, are issues that CAPA supports.

CAPA concurs with the addition of the Gulf of Mexico High and the Atlantic High Offshore Airspace to the list of potential RVSM airspace published in part 91, Appendix G, section 8.

CAPA concurs with the implementation of RVSM between the Fight level (FL) 290-410 feet in the San Juan FIR and in the airspace corridor between Florida and the San Juan FIR.

CAPA fully concurs with removing the proposal that would allow turbo-prop aircraft to fly in RVSM airspace with only a single RVSM compliant altimeter.


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DEPT OF TRANSPORTATION  
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As stated in the comments submitted by CAPA on August 5, 2002, CAPA strongly supports the implementation of the Traffic Collision Avoidance System (TCAS) on all the aircraft participating in RVSM. CAPA believes this is a critical safety issue that must be addressed and added to the SNPRM.

As stated by one of our member's comments, the Allied Pilot Association (APA), CAPA would like to see a safety analysis of RVSM. According to the initial comments that our member submitted on RVSM, the FAA has not done a safety analysis or a risk assessment of the proposed RVSM implementation.

CAPA thanks the DOT for giving us this opportunity to express our views and concerns on RVSM.

A handwritten signature in black ink, appearing to read "Jon G. Safley", with a large, stylized flourish at the end.

Captain Jon Safley  
President  
Coalition of Airline Pilots Associations